



September 17, 2021

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: **Notice of Ex Parte Presentation, Implementation of the National Suicide Hotline Improvement Act of 2018, WC Docket No. 18-336**

Dear Ms. Dortch:

On September 15, 2021, representatives of CTIA and several of its member companies met via video conference with Federal Communications Commission (“FCC” or “Commission”) staff to discuss the implementation of text messaging to the 988 emergency number to reach the National Suicide Prevention Lifeline (Lifeline).¹ The names and affiliations of the individuals who attended the video conference are listed in the Attachment to this letter.

As CTIA has stated previously, and reiterated during the video conference, CTIA strongly supports the Commission’s efforts to implement the 988 emergency number to reach the Lifeline, and noted that mobile wireless carriers have been among the first to deploy 988 dialing for voice calls, in some cases more than eighteen months ahead of the Commission’s July 16, 2022 deadline.² As CTIA observed in its comments in this proceeding, the implementation of text-to-988 capability will save lives by enabling more people in crisis to reach the Lifeline—particularly people from groups at higher risk of suicide including young people, members of the LGBTQ community, people of color, and people with disabilities.³

To achieve these goals, CTIA reiterated its support for implementing text-to-988 by the same July 16, 2022 deadline for voice calls, and discussed how the Commission should rely on the native

¹ See *Implementation of the National Suicide Hotline Improvement Act of 2018*, Further Notice of Proposed Rulemaking, 36 FCC Rcd 7943 (2021).

² *Wireless Providers Are Making it Easier to Access the National Suicide Prevention Lifeline by Enabling 9-8-8 Calling Ahead of Schedule*, CTIA Blog, <https://www.ctia.org/news/wireless-providers-are-making-it-easier-to-access-the-national-suicide-prevention-lifeline-by-enabling-9-8-8-calling-ahead-of-schedule> (July 15, 2021).

³ See Comments of CTIA, WC Docket No. 18-336 (filed July 12, 2021) (CTIA Comments); Reply Comments of CTIA WC Docket No. 18-336 (filed Aug. 10, 2021) (CTIA Reply Comments).



capabilities of the broadly used short messaging service (SMS) system and employ established and well-understood legal authority, definitions, and processes developed in the text-to-911 context.⁴

In order to ensure that text-to-988 can be implemented by the July 16, 2022 deadline, CTIA discussed why the Commission should require covered providers to direct text-to-988 messages to the Lifeline. Central routing is consistent with how voice calls to 988 are required to be routed to the Lifeline, and consistent with how the Lifeline receives texts to its current toll-free number today.⁵ Importantly, Vibrant Emotional Health, the entity that operates the Lifeline under contract to the Substance Abuse and Mental Health Services Administration (SAMHSA), agrees with this approach and explains that “[r]outing texts through the central administration of Lifeline allows for a seamless delivery of crisis intervention services that is consistent with clinical standards, best practices, and national guidelines overseen by the administrator and SAMHSA.”⁶ Commenters in the proceeding likewise urge the Commission to require routing texts to 988 centrally to the Lifeline, and explain that taking a different approach would delay implementation well beyond the July 2022 deadline.⁷

CTIA also discussed why the Commission should continue to enable the Lifeline to send bounce-back messages in situations where a text does not reach the Lifeline. CTIA and its members recognize the importance for people in crisis to receive a notification in the event their text to the Lifeline cannot be delivered. If the Lifeline is unable to receive or process a text message, only the Lifeline will have the information to be able to notify the texter of delays or other issues with delivery.⁸ Vibrant indicates that it has systems in place today to provide these notifications to consumers, and describes how the Lifeline currently sends bounce-back messages to individuals who text the Lifeline but are not able to reach a counselor immediately: “If there is a wait to reach a crisis counselor, texters will receive scheduled texts that let them know they’re still in the queue. The scheduled texts

⁴ See CTIA Comments at 8-11; CTIA Reply Comments at 5-6.

⁵ Comments of Vibrant Emotional Health, WC Docket No. 18-336, at 3 (filed July 12, 2021) (Vibrant Comments). By routing texts to 988 to the Lifeline centrally, texts to 988 sent while the customer is roaming will be delivered to the Lifeline in the same way that any text would be delivered when sent by a roaming customer in the ordinary course.

⁶ *Id.*

⁷ See CTIA Reply Comments at 7-8.

⁸ CTIA discussed how the need for bounce-back messages in the text-to-988 context is fundamentally different from the scenario in which bounce-backs are required in text-to-911 rules. When a bounce back is needed in text-to-988, it is due to the dynamic operational issues that may arise with delivery to the Lifeline, such as capacity restraints or unavailability of counselors. In contrast, when a bounce back is needed in text-to-911, it is because the PSAP has not enabled text-to-911 functionality, and providers have this information and can notify texters of such. As a result, the Commission’s text-to-911 bounce back rules are not an appropriate model for its text-to-988 rules in this context.



offer resources such as Vibrant’s online Safe Space while they wait. Texters in queue are also given the option to call the Lifeline as well.”⁹ Any requirement to develop new or different notification capabilities would require substantial additional time and complexity, as well as the development of standards and requirements for implementation, and would significantly delay the July 16, 2022 implementation target. The Commission should therefore maintain the Lifeline’s responsibility to notify texters of issues on the Lifeline’s end,¹⁰ which will promote deployment of text-to-988 and enhance the accessibility of critical mental health services as quickly as possible.

Pursuant to Section 1.1206 of the Commission’s rules, this notice is being filed in ECFS and provided to the Commission meeting attendees. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Sarah Leggin

Sarah K. Leggin
Director, Regulatory Affairs

Attachment

cc: FCC meeting attendees (see Attachment)

⁹ Vibrant Comments at 3.

¹⁰ As SMS is a “best-efforts” service, network failures are rare due to redundancies in the SMS network. In the rare cases where the text messaging provider is unable to deliver a text message (such as when the device cannot connect to the network), the customer generally receives a notification indicating that the message has not been delivered. The process will operate in the same manner for text messages sent to the Lifeline via 988 as it does for text messages sent via 911—i.e., the device or the network will notify the customer of message failures under the same circumstances.



ATTACHMENT

The following individuals attended the September 15, 2021 meeting referenced above.

CTIA

Sarah Leggin

Tyra Carroll

L. Charles Keller, Wilkinson Barker Knauer, LLP

AT&T

Robert Vitanza

Vonda Long-Dillard

T-Mobile

Rosemary Emmer

Indra Chalk

USCellular

Bill Tortoriello

David Conner

Verizon

Robert Morse

FCC

Daniel Khan

Pamela Arluk

Melissa Droller Kinkel

Heather Hendrickson

Michelle Sclater

Elizabeth Cuttner

Emily Caditz

Benjamin (Jesse) Goodwin

Jamie McCoy

Kenneth Carlberg